

EXHIBIT A

**DECLARATION OF CHARLES M. MARSTELLER IN SUPPORT OF
DEFENDANTS' OPPOSITION TO MOTION FOR PRELIMINARY
INJUNCTION**

TO: SFCC BOARD
 FROM: Charles Marsteller (415/567.1739)
 RE: S.F. Corruption Probe

FBI Raids/Grand Jury

08.01.99	SFE	FBI Seals Off S.F. Agency	HRC Raid
08.02.99	SFE	FBI Probes HRC Staff, Papers	HRC Raid
08.03.99	SFC	FBI Intensifies Probe of Two SF Agencies	HRC/HA Raids
08.03.99	SFE	FBI's SF Bribe Probe	HRC/HA Raids
08.03.99	SFC	FBI Intensifies Probe of Two SF Agencies	HRC/HA Raids
08.03.99	SFI	FBI Seizes Housing Agency Records	HRC/HA Raids
08.04.99	SFC	Subpoenas Issued for Records at Redev. Agency	Redevelopment/HA
08.06.99	SFE	FBI Seizes More City Records	HRC/SFUSD/DPW/Airport
08.08.99	SFE	Contracts for SFO a Focus of FBI Probe	Airport Raids
08.11.99	SFE	FBI Probe Turns to Bayfront Property Proposals	Lennar Raids
08.17.99	SFE	Supervisors Seek Public Hearing on FBI Probe	HA
08.17.99	SFE	Feds Subpoena Housing Authority Workers	HA
08.26.99	SFC	Mayor Brown's Silence About a City Scandal	FBI Raids
09.03.99	SFE	Outrage at Coverage of Rights Panel Probe	HRC Raids
02.02.00	SFE	Probe Hits Mayor's Office	Grand Jury
02.15.00	SFE	Grand Jury Subpoenas of Brown's Meetings	Grand Jury

Walker

08.01.99	SFE	FBI Scrutinizes Mayor's Contractor Pal	Walker
08.04.99	SFC	FBI Probe Zeroing in on Brown Buddy	Walker
08.05.99	SFC	Brown Denies Tie to Probe Figure	Walker
08.05.99	SFC	Charlie Walker Throws Big Bashes for Mayor Each Year	Matier & Ross
08.06.99	SFC	A Dirty Ring Around City Hall	Walker
11.28.99	SFE	FBI Probe Blamed on Racism	Walker
12.01.99	SFE	Mayor Calls Pal's Remarks Racist	Walker

Walker's False 501(c)(3) Non-profit (Third Street Economic Development Corporation)

01.22.98	SR	2000 Attend Bash for Brown	2nd Anniv (\$140)
08.04.99	SFE	Brown Pal Falsely Claims Tax Exemption	Walker's 501(c)(3)

Walker's Non-profit City Grant

10.18.99	SFE	Funding Under Fire	Walker City Grant
01.28.00	SFE	City Told to Repay HUD Grant	Walker's 501(c)(3)

Walker/Parks & Recreation

06.21.00	SFC	Party Time (Missing \$2K)	Walker Theft?
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Norman

08.03.99	SFC	SF Exceeds Minority Goals in SFO Expansion	Scott-Norman
08.03.99	SFE	SFO Beats Its Goals for Minority Contracting	Scott-Norman
08.21.99	AP	Company that Won Minority Contracts Controlled by Whites	Scott-Norman
08.22.99	SFE	FBI Probe Focuses on Minority Builder	Scott-Norman
08.22.99	SFE	Minority-Owned Firm--Not	Scott-Norman
08.22.99	BEE	Report: Minority Firm Run by Whites	Scott-Norman
08.24.99	SFE	Ammiano, HRC Leader Want Probe of Hunters Point Firm	Scott-Norman
03.21.00	SFC	Jail Sought in Minority Contract Probe	Scott-Norman
04.28.00	SFC	Five Indicted in Airport Fraud Probe	Scott-Norman/HRC
04.28.00	SFC	Federal Probers in SF Hope to Catch Ever-Bigger Fish	Matier & Ross

Norman Bayview Land Deal**

03.21.00	SFC	S.F.Reviews Bayview Land Deal	Norman/Stony Hill
04.19.00	SFC	Bayview Project Developer May Get Extension	Norman/Stony Hill
06.28.00	SFC	Bayview Development Proposal Quashed	Norman/Stony Hill

Lennar

08.11.99	SFE	FBI Probe Turns to Bayfront Property Proposals	Lennar
04.05.00	BV	No Love Lost on Lennar	Lennar
07.12.00	SFC	More Low-Cost Housing Called for at Hunter's Pt.	Lennar
07.18.00	SFI	Shipyards Plan Blasted by Bayview Residents	Lennar
07.21.00	SFC	Shipyards Development Plan Receives First Stage Approval	Matier & Ross

Accu-crete, Inc of LA

10.24.99	SFE	SFO Work Went to Outsider	Accu-crete
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Jefferson

08.10.99	SFC	Life's Dandy if You're a Pal of Brown	Jefferson (by Garcia)
08.11.99	SFC	SFO People-mover Documents Subpoenaed	Jefferson

Tudor-Saliba

08.08.99	SFE	(Week's Summary)	Tudor-Saliba
00.00.99	SFC	Bart Checks its Minority SFO Contracts	Tudor-Saliba
12.07.99	SFC	SFO Contractor in Legal Tangle	Tudor-Saliba

Airport

08.03.99	SFC	SF Exceeds Minority Goals in SFO Expansion	Scott-Norman
08.03.99	SFE	SFO Beats its Goals for Minority Contracting	Scott-Norman
08.06.99	SFE	FBI Seizes More City Records	HRC/SFUSD/DPW/Airport
08.08.99	SFE	Contracts for SFO a Focus of FBI Probe	Airport
08.11.99	SFC	SFO People-mover Documents Subpoenaed	Jefferson
08.12.99	SFE	SFO Chief Testifies About Contracts	Airport
10.24.99	SFE	SFO Work Went to Outsider	Accu-crete
11.28.99	SFE	Builders at SFO Face Audit	Renne Probe
00.00.99	SFC	Bart Checks its Minority SFO Contracts	Tudor-Saliba
12.07.99	SFC	SFO Contractor in Legal Tangle	Tudor-Saliba
01.16.00	SFE	How FBI's SFO Probe Changed Direction	
03.22.00	SFW	SF International Airpark	
04.28.00	SFC	5 Indicted in Airport Fraud Probe	Zula Jones/Scott-Norman
04.28.00	SFC	Federal Probers in SF Hope to Catch Ever-Bigger Fish	Matier & Ross
04.28.00	SFE	City Official, 4 Execs Indicted	Zula Jones/Scott-Norman
05.19.00	SFC	5 Plead Not Guilty to SF Minority Contract Rigging	Zula Jones/Scott-Norman
06.19.00	SFE	Accused City Official Still Playing Key Role at Agency	Zula Jones
07.12.00	SFE	City Commission Won't Oust Contract Official	Zula Jones/Civil Serv.
07.13.00	SFC	SF Worker to Stay on Job Despite Indictment	Zula Jones
09.19.00	SFE	Suspect opposes release of affidavit	Egelko
09.21.00	SFC	City Official Requests Sealing of Documents	no byline
11.04.00	SFC	Affidavit Unsealed in SF Probe	Hoge
11.04.00	SFE	Affidavit accused official of shredding evidence	Finnie
11.21.00	SFC	Black-Owned Firms Say They Were Cheated	Hoge
12.03.00	SFC	Dispute Over Cost of SFO Terminal	Hoge

Human Rights Commission Mismanagement MBE/Zula Jones

09.03.99	SFE	Outrage at Coverage of Rights Panel Probe	HRC Raids
10.14.99	SFE	Rights Agency Panel Probes its Director	Bamba
10.31.99	SFE	HRC Chief: Review Left to Staff	Bamba
04.28.00	SFC	5 Indicted in Airport Fraud Probe	Zula Jones/Scott-Norman
04.28.00	SFC	Federal Probers in SF Hope to Catch Ever-Bigger Fish	Matier & Ross
04.28.00	SFE	City Official, 4 Execs Indicted	Zula Jones/Scott-Norman
05.19.00	SFC	5 Plead Not Guilty to SF Minority Contract Rigging	Zula Jones/Scott-Norman
09.19.00	SFE	Suspect opposes release of affidavit	Egelko
09.21.00	SFC	City Official Requests Sealing of Documents	no byline
11.04.00	SFC	Affidavit Unsealed in SF Probe	Hoge
11.04.00	SFE	Affidavit accused official of shredding evidence	Finnie

Jonnie Robinson

06.11.00	SFE	Airport Contract Under Scrutiny	Steered Contract
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Kevin Williams (attacked by Zula Jones)

05.24.00	SFE	FBI Witness Says Demotion was a Reprisal	Kevin Williams
06.14.00	BV	Whistles are Blowing in the City	Kevin Williams
06.14.00	BV	The Tyranny Within	By Kevin Williams
12.22.00	SFC	Testimony Led to Demotion SF Rights Officer's Suit Says	Finnie & Williams

Renne SFO Lawsuit

12.04.99	SFC	3 Firms Buck at Probe of Airport Contracting	Scott-Norman
03.21.00	SFC	Jail Sought in Minority Contract Probe	Scott-Norman

Krystal Trucking (Phillip & Maryann Rogers)

09.02.99	SFC	FBI Probes Firms Run by Wife of Major Trucking Contractor	Rogers
09.03.99	AP	FBI Investigating Trucker Who Benefited from Min.Assistance	Rogers
04.02.00	SFE	Report on Trucking Company was Ignored	Rogers

Hensel Phelps

08.20.99	SFC	Behind FBI Probe of SF Contracts	Hensel Phelps
09.07.99	SFC	Corrupt Contracting Nothing New in SF	Hensel Phelps

Cowan

09.11.99	SFC	Lawmakers OK Plan for Bay Ferry Agency	Cowan
07.14.00	SFC	Politics Submerges Deal for Bay Area Ferry Service	Cowan

SKS/Bryant Square

*01.05.00	BG	Zoning for Sale	Porterfield & Thompson
01.05.00	BG	Reject Bryant Square	Editorial
05.04.00	SFC	SF Dot.Com Project Before Panel Today	Bryant Square
06.27.00	SFC	Disputed Mission District Dot Com Project Ok'd	Bryant Square

Emerald Fund/Alemanly

07.17.00	SFC	Alemanly Battle Over Too Tall Project	Emerald Fund
07.18.00	SFC	Neighbors Lose Battle on Development	Emerald Fund
07.25.00	SFI	Controversial Alemanly Development Clears Hurdle	Emerald Fund

Sutro Tower

04.30.00	SFE	FBI Probes Approval of Sutro Tower Expansion	FBI
05.05.00	SFE	Interim Zoning Administrator Gets Job	Badiner
05.25.00	SFE	Tough Sutro Hearing Rejected	Permit Appeal
05.31.00	BG	Sutro Sleaze	Lobbyist Contributions
06.14.00	BG	Yee Calls Hearing on Sutro Tower Decision	SF BOS
08.04.00	SFE	City's planners approve Sutro's antennas	Bulwa

Department of Building Inspection

03.15.00	SFC	SF Building Inspection Office Focus of Probe	Rudy Pada
03.16?00	SFC	Full Probe of Bribe Charge Is Promised	Pada/O'Donoghue
07.11.00	SFC	FBI Probes SF Bldg Inspectors	
09.26.00	SFC	Building Official Sets Off Firestorm in Slander Suit (Jen)	Wallace & Sward
09.27.00	SFC	Judge Likely to Toss Suit Against Two SF Officials (Jen)	Wallace & Sward
10.13.00	SFC	Judge Bills Jen for SF Legal Fees (Jen)	Sward
11.01.00	SFC	Neighbors Battle SF Agency Over Remodeling Project	Wallace & Sward
11.10.00	SFE	Well-paid insiders slash red tape for builders (Jen)	Walsh

O'Donoghue

07.17.00	SFC	The House that Jack Built	O'Donoghue
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Housing Authority

09.14.99	SFC	Informant Charged in S.F.Housing Probe	Baker/Section 8
09.15.99	BG	Living High Off Public Housing	Smith Contract
09.22.99	SFC	24 Charged in Housing Authority Bribe Case	Section 8
09.22.99	SFE	Housing Authority Bribery Arrests	Section 8
11.16.99	SFC	Four Indicted in SF Housing Probe	Section 8
04.04.00	SFC	U.S.Inspectors Assail S.F.Housing Authority	Audit #1
04.04.00	SFE	SF Housing Chief Fires Back After Critical Audit	Audit #1
04.07.00	SFC	New Report Slams SF Housing Chief	Audit #2 (Cleveland)
08.31.00	SFC	Housing Bribery Detailed	Hoge
09.01.00	SFC	SF Bribery Saga-Star Witness Says Boss Ratted Her Out	Hoge
09.14.00	SFE	Housing exec: 'I didn't take bribes'	Finnie & Williams
09.15.00	SFC	SF Housing Official Denies Taking Bribes	Hoge
09.18.00	SFE	Housing bribery cases: pure greed, prosecutor says	Finnie & Williams
09.19.00	SFE	Bribery case winding down	Finnie & Williams
09.28.00	SFC	SF Housing Official Guilty of Bribery	Hoge
09.28.00	SFE	Jury splits verdict in bribery trial	Finnie & Williams
10.01.00	SFE	Housing chief to face prison	Finnie & Williams
12.06.00	SFW	The Great Minnow Hunt	Byrne

Antenore, Former Planning Commissioner

09.19.00	SFC	SF Mayor Fires Commissioner for Views on Growth	Baker
09.19.00	SFE	Planner fired for stand on growth	Finnie
09.20.00	SFE	Real estate pros named to SF planning panel	Finnie
09.20.00	SFE	Willie's guillotine	Editorial
09.21.00	SFE	Newest planner is Robert Lurie kin	Finnie
09.26.00	SFC	Ammiano Calls for Hearing	Baker
09.26.00	SFE	Ammiano challenges planning appointee	Lelchuk
09.29.00	SFE	Commisioner accuses Ammiano of racism	Kim
11.01.00	BG	Ending Backroom Planning	Antenore

Special Assistants/Patronage

09.15.99	BG	Living High Off Public Housing	Smith Contract
09.15.99	BG	Patronage Politics: Favors & Favoritism	Blackwell
09.15.99	BG	Ending Patronage Politics	Editorial
05.09.00	SFE	Mayor Wants Own School Czar	Cortines
06.19.00	SFC	SF Fire Chief Bends Rules to Hire Someone Special	Matier (re: Francois)
06.27.00	SFE	Brown's Cadre of S.A. Mushrooming	Lelchuk
11.16.00	SFC	Brown Foe Says Mayor Has a Patronage Army	Epstein re: Yee
12.19.00	SFI	What, Exactly Does Ray Cortines Do?	Gershon
03.30.01	SFE	City Jobs: Shame on Somebody	Hwang/Merrill
04.04.01	BG	Friends or Foes: Supv. Peskin wants S.A. to be less Special	Blackwell
04.04.01	SFE	Curious Hiring in Special Assistants	Hwang/Merrill
04.05.01	SFE	Peskin Wants Roster of S.A.	Hwang
05.19.99	SFI	Reclassifying Assistants Problematic	Aldrette
07.28.01	SFC	CGJ Critical of 630 Aids in SF	Sullivan

Comer Marshall

05.12.00	SFE	Brown to Non-profit: Ax Boss or Lose Cash	Comer Marshall
05.16.00	SFE	Mayor: No Threat to Non-profit	Comer Marshall
05.17.00	SFE	Federal Probe of Program for Minority Loans	Comer Marshall
08.01.00	SFE	Fed Probe of Alleged Threat by Mayor	Comer Marshall
08.02.00	SFC	Alleged Threats by Aide to SF Mayor Being Inv.	Gene Coleman
08.18.00	SFC	Min. Business Group Under Federal Probe will be Shut Down	Hoge

IPO (list incomplete)

04.05.00	SFC	Mayor Brown has Gone to Market	IPO
04.04.00	SFE	SF Mayor Makes a Bundle on Stock Picks	IPO
04.07.00	SFC	SF Mayor had Inside Track for IPOs	IPO
04.11.00	SFE	Mayor's IPO Firm Wins Deal	Morgan Stanley

Meriweather/Pier 30-32

07.05.00	BG	No Cash, No Contract	Meriweather
07.05.00	BG	Meet Me in the Alley	Meriweather
07.05.00	BG	Clean Up the Sleaze	Editorial
07.26.00	BG	Take 'em to Court	Meriweather

Eller Media Billboards

12.16.98	BG	Sneak attack: Kaufman railroads unconstit. newsrack law	Lyman
11.01.99	SFC	Brown Getting By With a Lot of Help From His Friends	Matier & Ross

*articles quoting SF Common Cause

SFC	SF Chronicle	BG	SF Bay Guardian	BEE	Sacramento Bee	SFW	SF Weekly
SFE	Hearst Examiner	SFI	SF Independent	SR	SF Sun-Reporter	BV	SF Bayview

note: Fang Examiner and the Mercury Daily News on-line daily ONLY (no archival access) via Digital City.
The S.F. Chronicle is searchable from 01.01.95; the Hearst Examiner is searchable from 01.01.95-07.28.00.

**Berri McBride/TX, Theodore Cook/San Mateo; Robt. Upton/San Rafael, Ralph Butterfield & Al Norman/SF

TO: SFCC BOARD
 FROM: Charles Marsteller (415.567.1739)
 RE: S.F Fundraising/Politics

1999 Election

*06.24.99	SFC	Spending Limits Lifted in SF Mayor's Race	Wildermuth
07.30.99	SFC	Brown Sitting Pretty Atop Big Pile of Cash	Semi-annual
07.30.99	SFE	Mayor's Campaign War Chest Already \$1M	Semi-annual
08.01.99	SFE	Polls Notwithstanding, Willie Brown Raises \$1M but the \$500 per-Donor Limits the Role of Fatcats	Semi-annual
08.03.99	SFC	Brown Campaign Sitting on Fat Balance	Semi-annual
*09.07.99	SFI	Reilly's record of finance violations	Gallagher
*09.24.99	SFE	Brown, Reilly in Battle of War Chests	Coile & Lelchuk
*09.30.99	SFE	Soft Money Flows to Brown	Coile & Lulchuk
*10.12.99	SFC	Soft Money Gives Brown Deeper Pockets	Wildermuth
10.28.99	SFE	State Workers Urged by Speaker to Aid Brown	Assembly Victory Fund
11.01.99	SFC	Brown Getting by with a lot of Help w/Friends	Ind.Exp.Committees
*11.24.99	BG	Better to Give than to Receive	Porterfield
12.01.99	SFC	Soft Money Contributors Will Do What Brown Won't	Ind.Exp.Committees
*12.11.99	SFC	Brown's Friends Spend Lavishly	Epstein
*12.08.99	BG	Driving the Gravy Train	Porterfield
*12.14.99	SFE	City voters have their say	Lelchuk
*12.15.99	BG	End the Soft Money Scam	Editorial
*12.15.99	BG	Election Sets New Records for Money	Blackwell
12.16.99	SFE	Tab for Mayor's Landslide: \$5 Million	Ind.Exp.Committees
*01.12.00	SFE	Brown's Big PAC Men	Lulchuk
*02.16.00	BG	The Best Mayor Money Can Buy (Knox)	Ind.Exp.Committees

SF.Demo Central Committee Soft Money

*09.07.99	SFE	Brown Nets Soft Money Windfall	Williams & Finnie
*09.07.99	BI	Report: Companies that have contracts with the city are feeding Brown's re-election machine	no author
09.08.99	SFE	Demos Back Off on Brown Campaign	Williams & Finnie
*09.08.99	AP	Firms with S.F.Contracts Help Brown's Campaign	(Sacramento Bee)
*02.02.00	BG	The party's over	Blackwell

2000 Election

*08.02.00	SFE	Supervisor races: Sound of Money	Gordon
10.04.00	BG	District elections notebook: first signs of soft money	Roth
10.28.00	SFE	Soft money flows to SF candidates	Gordon/Lelchuk
*10.30.00	SFE	800-pound gorilla of political spending	Finnie
11.01.00	BG	Follow the money	Roth
11.01.00	BG	Reject Brown Lies (via soft money)	Editorial
11.01.00	SFW	Down on Brown (Bayview/Hunter's Point)	Byrne
*11.08.00	SFE	Willie Brown's picks have rough day a polls	Lelchuk
12.02.00	SFC	Builder's to Inject Big Money Into Runoffs	Epstein
12.04.00	SFC	Brown's Aides to Assist His Picks	Gordon
*12.07.00	SFE	Soft Sway	Hwang (Porterfield)
12.10.00	SFE	Soft money committees spend big bucks....	Hwang
12.13.00	SFC	SF Elections Loosens Mayor's Grasp on Board	Epstein/Lelchuk
12.13.00	SFC	SF Voters Stunning Repudiation of Willie Brown	Matier
12.14.00	SFC	Soft Money Campaigns Didn't Sway Voters (\$28/vote)	Lelchuk
12.14.00	SFE	Big money does not influence runoff results	Brannon
12.20.00	BG	What went right	Richmond/Roth/Blackwell

Slate Mailers

11.01.00	BG	Return to Sender (RFK Club)	Blackwell
11.04.00	SFC	Some Slate Card Mail Merely Paid Political Ads	Bell

School Board 'Soft Money'

11.04.00	SFC	Soft Money Pours Into School Races	Asimov
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Brown's 501(c)(3)

01.25.99	SFE	Pots of Cash; Secret Donors	McCormick
02.02.99	SFE	Willie Brown's Secret Slush Funds	Editorial
02.23.99	SFE	Letters to Editor: Slush Fund Secrecy	Knox Letter
*09.20.99	SFE	Donors Millions Burnish Mayor	Williams & Finnie

Remcho

*09.22.99	BG	All in the Family	Roth
09.22.99	BG	Brown's Big-Money Conflict	Editorial
*12.10.99	AP	SF Mayor's Race Awash in Soft-Money Spending	Warren

Davis 501(c)(3)

08.01.00	SFC	Gov.Davis Already Has Raised \$21 Million	Davis
08.02.00	SFC	Davis Pulls In Contributions by the Bucket	Davis
08.03.00	SFC	Big Donor to Davis Got Exemption...	Davis

Supv.Teng (501(c)(3) etc)

*09.16.98	BG	The real Teng	Blackwell
09.22.98	SFI	Supe's close ties to voter group raises questions	Gallagher
*09.24.98	AW	Voter Drive Raises Questions About Teng	Soo

Fisher 501(c)(3)

10.04.00	SFBG	Attorney General Investigating Fisher Charity	Woodward
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Brown's Lawfirm

03.24.99	SFW	Law and Odor	Lawfirm
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Brown and CA Democratic Party Chairmanship

12.06.00	SFC	Willie Brown Scouts Out Job As State Chair	Lucas
12.07.00	SFC	No Moonlighting, Mr.Mayor	Editorial
12.08.00	SFC	Brown's Bid to Head State Party Doesn't Sit Well With Davis	Matier
12.09.00	SFC	Brown Decides to Back Current Party Chair	Epstein

Mosher-Barnes-Whitehurst (BMW)

12.17.99	SFC	Breadth of Brown's Win...Beat Expectation	Matier & Ross
02.03.00	SFC	SF Political Consultants to Form Major Firm	Epstein
*08.02.00	SFE	Supervisor Races: Sound of Money	Gordon
08.05.00	SFC	New Team in Town Vaults to Top of SF Lobbyist Ranks	Wilson
08.25.00	SFC	Brown Wants 500 More Taxicab Permits Issued	Barnes
*10.30.00	SFE	800-pound gorilla of political spending	Finnie

Gifts to Voters

12.11.00	SFC	Supe's Supe	Matier & Ross
12.12.00	SFC	Parties, Gifts Lure Voters to Polls Early	Matier & Ross
12.13.00	SFE	Food Enticement by Wong Campaign Upsets Peskin	Hwang
12.13.00	SFC	Election Door Prizes	Editorial